

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO,
EASTERN DIVISION

FILED

JUN 24 2024

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

LARRY D. REID, *et al.*,

Plaintiff,

v.

DARRYL D. MOORE,

Defendant.

) CASE NO.: 1:21-CV 00991

)
) MAGISTRATE JUDGE: J.
) GREENBERG

MOTION TO DISQUALIFY THE TESTIMONY OF DAVYON AUGUSTUS

NOW Comes, Defendant, Darryl D. Moore, pro se, hereby respectfully moves this honorable Court to disqualify the testimony of Davyon Augustus based on fraud (i.e., lying) by this perspective witness in previous actions on social media at the behest/on behalf of the Plaintiff in this civil action.

STATEMENT OF FACTS

Davyon Augustus has a Civil Stalking and Protection Order against him for stalking and harassment (CV-22-964092) along with an active Federal Civil lawsuit for telecommunication harassment, slander, defamation, and threats via social media (CV-24-00923). The CSPO was granted due to Augustus constant threats and harassment via social media and his phone calls to my former place of employment and personal cellphone. Even though I was granted the CSPO, Augustus continued to harass me nonstop on social media on behalf of the Plaintiff. I was compelled to file a civil lawsuit against him. The civil lawsuit is active.

Video evidence of Augustus has previously been sent to this court outlining in graphic detail his actions. Even the counsel for the Plaintiff has said that he "is out of his fucking mind".

This was in an email sent as evidence to this court that was dated December 21, 2021. How can a person go from being mentally unstable to being a credible witness in this case? Video evidence proving that Augustus works for the Plaintiff (either as an employee or contract worker) has been submitted to this court in previous filings. Augustus has received payments and gifts in kind as compensation for his services rendered as it pertains to harassing me and discussing every detail of this case on his podcast. Augustus serves as the public mouthpiece for Larry Reid so that he deny under oath that he is online discussing me directly. Augustus has done this once before for Larry Reid against Pastor E. Dewey Smith. The court transcripts from that case show the role of Augustus discussing Pastor Smith after Larry Reid supplied him with information that Reid was forbidden to discuss after he signed an NDA. That NDA has been submitted to this court. The financial records of the Plaintiff will prove Augustus works for Reid. That is why the Plaintiff's counsel has vehemently fought to have my request for his financial records to be excluded from this hearing. As a paid employee, Augustus is bound by the terms of the mediation like the Plaintiff and me. He cannot skirt around the mediation by lying and stating that he does not work for Larry Reid.

Augustus uploaded an altered video on YouTube that purported that I wanted to put two bullets in the chest of Larry Reid. I filed a police report and submitted it to YouTube requesting the video be removed after I showed the original un-edited version. The video was removed by YouTube, but Augustus put it back up. This was one of the primary reasons that I filed a report with the FBI and Euclid Police Department against him. This led to me being granted a CSPO against him. He is a threat to my safety and my family.

Augustus went live on social media less than an hour after I became ill in the courtroom claiming that I had a heart attack. Furthermore, Larry Reid and Augustus were live on social

media days prior discussing this case. All these video links have been submitted to the court previously for review. Both of them violated the terms of the mediation.

After letters were submitted to this court on my behalf and uploaded to PACER, Augustus went live on social reading each letter. He mentioned the names and personal information of each person. One of the people that submitted a letter is a retired federal law enforcement officer. Shortly after Augustus read her personal information online, her home was broken into. I have submitted a copy of the police report. Augustus arrogantly stated how “dumb” he thought the letter writers were for including their contact information on the letters. He even threatened them on his podcast with reprisal. He further stated that the judge in this case would either arrest or sanction/fine them for supporting me. This is harassment and an attempt to intimidate witnesses/supporters.

This witness for the Plaintiff will do anything (including lie) to bring harm to me in this legal matter. Because of this, Augustus is not a credible witness. He has a track record of dishonesty (altering videos, lying, past criminal arrest, alleged drug use, and harassment of anyone who supports me in this case).

Respectfully submitted,

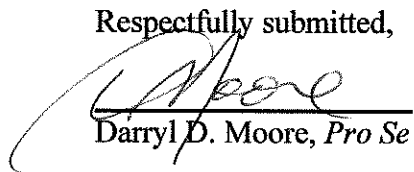


Darryl D. Moore, *Pro Se*

CONCLUSION

Based upon the facts set forth above and for the reasons thereby outlined above, the Defendants' *Motion* should be granted.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "D. Moore", is written over a horizontal line. The signature is fluid and stylized, with a large initial "D" and a trailing flourish.

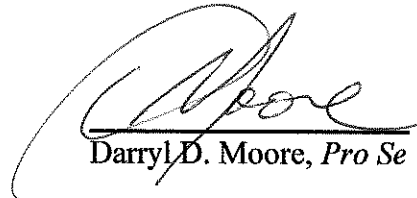
Darryl D. Moore, *Pro Se*

CERTIFICATE OF SERVICE

It is hereby certified that a true copy of the foregoing *Motion to Disqualify the Testimony of Davyon Augustus* was made via USPS mail with sufficient postage attached this __17__ day of June 2024.

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